



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Southern California Edison Company's)
Application For Approval of Embedded Energy)
Efficiency Pilot Programs for 2007-2008.)

A. _____
(Filed January 16, 2007) **A0701024**

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) APPLICATION FOR
APPROVAL OF EMBEDDED ENERGY EFFICIENCY WATER PILOT PROGRAMS
FOR 2007-2008**

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Dated: **January 16, 2007**

STATE OF CALIFORNIA

A. _____
(Filed January 16, 2007)

FOR 2007-2008

OVERVIEW OF SCE'S WATER ENERGY EFFICIENCY PILOT PROGRAM

PROPOSALS FOR 2007

In accordance with the Commission's directives as set forth in the Assigned Commissioner's Ruling on Process Related to the Consideration of Embedded Energy Savings Related to Water Efficiency dated October 16, 2006 in R.06-04-010 (ACR), Southern California Edison Company (SCE) hereby files this application requesting approval of its Proposed 2007 Pilot Partnership Program (Pilot) to determine embedded energy savings. The Pilot consists of five component program strategies.

The concurrently-submitted supporting testimony set forth in what has been preliminarily marked for identification as Exhibit SCE-1, discusses SCE's proposed partnership with the Metropolitan Water District of Southern California (MWD), its member agencies and the Lake Arrowhead Community Services District (LACSD), as well as details concerning the partners and SCE's proposed Pilot for implementation in July of 2007. The testimony describes the water

pilot program, the proposed funding, the program preparation and implementation, and the proposed Evaluation, Measurement, and Verification (EM&V) methodologies.

In D.06-12-038, the Commission directed the utilities “to incorporate water savings measures that could enhance the overall cost-effectiveness of the energy conservation programs while providing additional benefits to low-income customers.”¹ As part of this Application, SCE also proposes to implement two energy efficiency water conservation program strategies within its Pilot program that will benefit low-income customers. The first strategy targets high efficiency toilets (HETs) for customers in single and multi-family dwelling units in low-income neighborhoods, and the second strategy targets HETs in schools with dense low-income populations.

The supporting testimony also describes SCE’s proposed funding approach for the pilot program.

II.

ORGANIZATION OF SCE’S TESTIMONY

The testimony submitted in support of the 2007 Water Energy Efficiency Pilot Program Application, which has preliminarily been marked for identification as Exhibit SCE-1, comprises five sections.

Section I is an overview and simply discusses the context for this filing, along with a short summary of SCE’s requests and a brief description of SCE’s proposed partners. Gene Rodrigues is SCE’s witness for this section.

Section II provides an overview discussion of water conservation and embedded energy savings, SCE’s Proposed Pilot Program goals and objectives, partnering, low-income pilots and a brief explanation why any energy savings or demand reduction should count towards the

¹ Decision 06-12-038, *Order Adopting Utility Budgets For Low-Income Energy Efficiency Programs And California Alternate Rate For Energy*, pp. 16-17. (“This order directs all four applicant utilities each to file a specific program proposal for water conservation efforts. Each proposal shall identify specific ways to implement such energy efficiency water conservation programs for low-income customers, whether and how they might dovetail with other non-LIEE programs, which agencies they will work with, and a budget. . . .”)

Commission's aggressive ten-year energy efficiency goals set for SCE. This Section is supported by SCE witness Gene Rodrigues.

In Section III, SCE provides the details and estimated costs for the proposed Pilot program and five component strategies. SCE's witnesses supporting the testimony in Section III are David Bruder and John Nall.

In Section IV, SCE provides a discussion of its proposal for demonstrating savings potential and costs and also for evaluating the Pilot program and measuring the savings. SCE's witness for this section is Marian Brown.

In Section V, SCE provides details concerning SCE's proposed funding levels and flexibility for the Water Pilot. SCE also explains its method for funding the 2007 Water Energy Efficiency Pilot Program. SCE's witness for this section is Thomas Calabro.

III.

SUMMARY OF SCE'S REQUESTS

In this Application, SCE requests Commission approval of SCE's Partnership with MWD (its member agencies) and LACSD and our proposed Pilot program designed to encourage water conservation and to measure the embedded energy efficiency. Also, SCE requests that the energy savings and demand reduction resulting from the Water Energy Efficiency Pilot Program count toward the Commission's aggressive ten-year energy efficiency goals for SCE's service territory.

First, SCE seeks approval of its proposed Pilot program and five component strategies and the proposed budget. SCE has proposed five program strategies within its Pilot program to further the Commission's goals. Adoption of SCE's proposed Pilot will further the Commission's objective of ensuring the implementation and support of appropriate water and energy efficient programs and encouraging the strategic integration of water and energy conservation and efficiency efforts.

Second, SCE is proposing a methodology for evaluating, measuring and verifying the actual energy savings derived through the implementation of each of the proposed program strategies. SCE urges the Commission to adopt SCE's EM&V proposals.

Third, in this Application, SCE seeks authorization to use unspent, uncommitted energy efficiency funding from previous program cycles to fund SCE's proposed \$3.4 million budget. The \$3.4 million budget is not currently addressed in the 2006-2008 Energy Efficiency Decision. Moreover, the adoption of the proposed water efficiency Pilot will increase the energy efficiency total costs, even if only slightly, but by using unspent energy efficiency funds from the previous program cycle, there will be no rate impact on SCE's customers.

In summary, SCE has presented detailed descriptions of its proposed 2007 water efficiency Pilot and expenditures that SCE submits are reasonable. As such, SCE respectfully requests approval of its proposed plan and budget.

IV.

SCE'S WATER EFFICIENCY PILOT PROGRAM

SCE's proposed Pilot is an integrated suite of five coordinated program strategies. It will promote indirect energy savings through water conservation and educational outreach. The Pilot reflects extensive partnering with local and regional water agencies and will use multiple delivery channels to reach varied customer segments, including low-income customers.

A. Water Pilot Partnership Proposal

SCE proposes to partner with both MWD and LACSD to offer five creative program strategies in an innovative one-year jointly-funded Pilot program. SCE's proposal relies on a combination of proven technologies and creative applications.

1. Low-Income Direct Install High Efficiency Toilets Program

SCE will partner with MWD to deliver the direct installation of High Efficiency Toilets (HETs) for single- and multi-family households, in low-income areas within mutual MWD and SCE territories. SCE will identify potential low-income customers and other multi-

family opportunities. SCE will also work closely with MWD member water agencies to identify and reach target customers. SCE will rely on a network of contractors to install HETs.

2. Industrial Process Water Efficiency Program

SCE will also partner with the Municipal Water District of Orange County (MWDOC), a member agency of MWD, to deliver audits and recommendations for industrial processes to conserve water. MWDOC has a program that targets textiles, food processing, metal plating, and electronics.

SCE's proposed pilot will expand MWDOC's program. SCE will provide funding to deliver audits and recommendations while MWD and MWDOC will fund all incentives.

3. Express Water Efficiency Program

SCE will partner with the MWD to deliver advanced PH controllers to commercial customers with HVAC and/or large irrigation systems. SCE will incorporate these measures into the existing Express Efficiency non-residential retrofit rebate program. This will provide delivery avenues to customers previously unavailable to MWD. MWD was unable to provide technical assistance or design recommendations to customers. SCE will provide outreach education, marketing and administration necessary to leverage the existing Express Efficiency program to deliver water conservation measures.

4. Lake Arrowhead Water Conservation Program

SCE will partner with the Lake Arrowhead Community Services District (LACSD) to deliver indoor water-conserving devices to year-round residents and outdoor retrofits to the largest residential water consumers. SCE will co-fund LACSD's proposed program to expand the number of homes that can be served. LACSD will identify candidates and coordinate delivery while SCE will supplement LACSD's contribution to purchase of the devices.

5. Green Schools/Green Campus With Water Efficiency

SCE will partner with MWD to deliver water conservation education for K-12 and college students. The partners will also install HETs in schools located in mutual SCE and MWD service territories; especially targeting low-income areas. SCE's existing Integrated School-Based Program will be expanded to incorporate the Green Schools and Green Campus energy efficiency programs with this pilot program for water conservation. MWD will provide a contribution of \$165 per HET to offset cost of the direct install in school facilities.

B. Demonstrating Pilot Savings Potential And Expected Costs

The ACR directed SCE, and other IOUs, to implement a pilot program designed to maximize embedded energy savings per dollar of program cost. SCE presents embedded energy savings assumptions for each proposed strategy within the pilot. SCE believes this is reasonable for an initial pilot and adequately demonstrates to the Commission an expected level of embedded energy savings from the proposed pilot.

V.

EVALUATING WATER PILOT PARTNERSHIP

SCE will coordinate with the other IOUs and the Advisory Panel in identifying issues to properly and accurately measure and evaluate the embedded energy efficiency savings derived from the IOUs proposed water conservation pilot programs. SCE's proposal would address data collection, analysis, and development of measurement and valuation protocols to guide the future EM&V work.

VI.

**APPROVAL OF SCE'S PROPOSED PILOT PROGRAM COSTS AND FUNDING
PROPOSAL**

The ACR dated October 16, 2006, recommends the total cost for all of the IOUs pilots be limited to \$10 million. SCE has developed its pilot program with this budget recommendation.

SCE has also proposed more specific budgets for the various parts of its pilot proposal. Additionally, SCE has proposed funding the water pilot program from uncommitted funds from prior program periods.

A. Proposed Funding Levels And Flexibility For Water Pilot Partnership

SCE, in close collaboration with its proposed water partner providers, has identified both and overall budget as well as individual program strategy budgets for the one-year pilot. SCE proposes an overall pilot funding amount not to exceed \$3.427 million. The initial estimates of funding, participation and energy savings for each program strategy within the pilot are detailed in the Testimony and Appendices.

However, SCE foresees these initial program strategy budgets may need to be adjusted during program implementation in order to reach to changes in the forecasted participation levels in the strategies or other unforeseen events (e.g., partner withdrawal, increases to EM&V budget, Commission policy changes, etc.). Thus, SCE would like the authority to shift funds between pilot programs as the need arises. Finally, SCE is seeking clarification that it can enter into agreements during the one-year implementation period and honor those agreements, with pilot funds, after the one-year implementation period has concluded, if necessary.

B. SCE's Proposed Water Pilot Funding Proposal

The ACR determined that the total cost for these pilot programs would be \$10 million, and that the funding would be separate and apart from the funding established for the 2006-2008 energy efficiency programs. As discussed in the supporting testimony, the IOUs met and prorated the \$10 million among SCE, PG&E, SoCalGas and SDG&E based on 2006-08 Energy Efficiency Budgets. As a result of this proration, SCE was allocated \$3.4 million for its pilot programs. SCE requests the Commission approve the \$3.4 million budget for SCE's water efficiency Pilot.

SCE identified \$23.37 million in Public Goods Charge, Pre-1998 DSM and Procurement Energy Efficiency funds collected by SCE for Commission-authorized energy efficiency (EE)

activities in prior program cycles that, as of December 31, 2005, remained unspent and uncommitted. The amount includes interest accrued as of December 31, 2005 in SCE's Procurement Energy Efficiency Balancing Account, the Public Goods Charge Balancing Account and the Pre-1998 DSM Balancing Account. SCE has proposed to use a portion of the unspent funds for its proposed Palm Desert Project, however, there will be sufficient unspent funds remaining to effectively fund SCE's proposed Water Pilot Program.

SCE proposes to use this unspent/uncommitted energy efficiency funding to fund the proposed 2007 Water Pilot Program. Specifically, in this Application, SCE proposes to fund the Pilot at a total budget of \$3.4 million. A detailed discussion of the proposal is set forth below and in the accompanying testimony.

SCE seeks approval to supplement program expenditures funded through SCE's currently-authorized 2006-08 programs by up to an additional \$3.4 million for its Water Pilot Program for 2007. These funds have previously been approved by the Commission for energy efficiency programs and collected from SCE's ratepayers such that, as of December 31, 2005, sufficient funds remain unspent and uncommitted. This funding is sufficient to cover SCE's proposed pilot program implementation costs for 2007. SCE requests authority to record up to \$3.4 million in pilot program project expenditures for 2007 in SCE's PEEBA to pay for the pilot program costs.

VII.

STATUTORY AND PROCEDURAL REQUIREMENTS

A. Statutory And Procedural Requirements

This Application is made pursuant to the Commission's Order Instituting Rulemaking to Examine the Commission's Future Energy Efficiency Policies, Administration, and Programs in R.06-04-010, the Commission's Rules of Practice and Procedure and the California Public Utilities Code. SCE's authority for this request includes, but is not limited to, Sections 382, 399.2, 399.9, 451, 491, 701, 702, 739.1, 739.2, and 739.4 of the California Public Utilities Code,

and prior decisions, orders and resolutions of this Commission. SCE's request complies with Rules 2 and 3.2 of the Commission's Rules of Practice and Procedure, which specify the procedures for the filing of applications.²

B. SB 960 Requirements – Rule 2.1(c)

Rule 2.1(c) requires that applications “shall state in the application the proposed category for the proceeding, the need for hearing, the issues to be considered, and a proposed schedule.” These requirements are discussed below.

C. Proposed Categorization

SCE proposes to characterize this proceeding as “ratesetting” as defined in Rules 1.3(a), (d), (e) and 7.1.

D. Need For Hearings/Schedule For Resolution Of Issues

SCE believes that its proposals submitted herein and set forth in the supporting testimony constitute a sufficient record for the Commission to rule on pilot program plans and budgets without the need for evidentiary hearings. SCE also believes that all interested parties can comment and express their views through written protests and comments.

If workshops and/or hearings are deemed necessary, however, SCE requests that such proceedings be expedited and the schedule be designed and maintained so that a final decision will be rendered by June of 2007 to avoid any substantial delays in program rollout.

Implementing the pilot program as soon as possible will substantially benefit all parties during the utility workshops required by the ACR.

SCE proposes the following schedule:

² As instructed in the Commission's *Order Instituting Rulemaking* dated October 16, 2006, SCE is serving this application on the service list established for R.06-04-010.

| | |
|--|-------------------|
| Utilities file Applications | January 16, 2007 |
| Interested Parties file Comments or Protests | February 5, 2007 |
| Utilities file Reply Comments | February 20, 2007 |
| Workshop | February 26, 2007 |
| Prehearing Conference (if necessary) | March 5, 2007 |
| Hearings or Workshops (if necessary) | March/April 2007 |
| Commission issues Proposed Decision | May 1, 2007 |
| Commission issues Final Decision | June 1, 2007 |

E. Issues To Be Considered

The Commission must consider whether to approve SCE's partnership with MWD and LACSD, our jointly co-funded water and embedded energy efficiency pilot program plans, budgets, and our proposed funding sources and approach for the pilot.

F. Legal Name And Correspondence – Rules 2.1(a)

Southern California Edison Company is an electric public utility organized and existing under the laws of the State of California. The location of SCE's principal place of business is 2244 Walnut Grove Avenue, Post Office Box 800, Rosemead, California 91770. SCE's attorneys in this matter are R. Olivia Samad and Larry Cope. Correspondence or communications regarding this application should be addressed to:

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G. Articles Of Incorporation – Rule 2.2

A copy of SCE’s Certificate of Restated Articles of Incorporation, effective on March 2, 2006, and as presently in effect, certified by the California Secretary of State, was filed with the Commission on March 14, 2006, in connection with Application No. 06-03-020³ and is incorporated herein by reference pursuant to Rule 2.2 of the Commission’s Rules of Practice and Procedure.

VIII.

CONCLUSION

SCE respectfully requests that the Commission:

1. Approve SCE’s proposed Embedded Energy Efficiency Pilot Program for 2007-2008;

³ A.06-03-020 was filed on March 14, 2006, regarding approval of early transfer of Anaheim’s share of SONGS 2&3 to SCE.

2. Approve SCE's proposed funding mechanisms and budgets for the proposed Embedded Energy Efficiency Pilot Program;
3. Approve SCE's proposal for evaluating and measuring the Pilot Program; and
4. Approve SCE's request that any energy savings achieved should be counted toward the Commission's current adopted energy efficiency goals.
5. Grant such other further or different relief as the Commission finds just and reasonable.

Dated this 15th day of January, 2007, at Rosemead, California.

Respectfully submitted,

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January 15, 2007

VERIFICATION

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this **15th day of January, 2007**, at Rosemead, California.

/s/ LYNDA ZIEGLER

Lynda Ziegler
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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) APPLICATION FOR APPROVAL OF EMBEDDED ENERGY EFFICIENCY WATER PILOT PROGRAMS FOR 2007-2008 on all parties identified on the attached service list(s).

Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address.
First class mail will be used if electronic service cannot be effectuated.

Executed this **16th day of January, 2007**, at Rosemead, California.

/s/ JENNIFER ALDERETE

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R.06-04-010

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